

STATE OF SOUTH CAROLINA

(Caption of Case)

App. of Time Warner Cable Information Services to
Amend its Certificate of Public Convenience and
Necessity to Provide Telephone Services in the
Service Area of Farmers Telephone Cooperative,
Inc., and for Alternative Regulation

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2008 - 325 - C

(Please type or print)

Submitted by: Margaret M. FoxSC Bar Number: 65418Address: McNair Law Firm, P. A.Telephone: 803-799-9800P. O. Box 11390Fax: 803-753-3219Columbia, SC 29211

Other: _____

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

MCNAIR LAW FIRM, P.A.

ATTORNEYS AND COUNSELORS AT LAW

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October 17, 2008

Mr. Charles L. A. Terreni
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

**Re: Application of Time Warner Cable Information Services
(South Carolina), LLC, d/b/a Time Warner Cable to Amend
its Certificate of Public Convenience and Necessity to Provide
Telephone Services in the Service Area of Farmers Telephone
Cooperative, Inc., and for Alternative Regulation
Docket No. 2008-325-C**

Dear Mr. Terreni:

Enclosed for filing please find Farmers Telephone Cooperative, Inc.'s First Set of Interrogatories and First Set of Requests for Production to Time Warner Cable Information Services (South Carolina), LLC, d/b/a Time Warner Cable in the above-referenced docket. By copy of this letter and certificate of service, copies of these documents are being served on all parties of record.

Thank you for your assistance.

Very truly yours,



Margaret M. Fox

MMF/rwm
Enclosure

cc: Parties of Record

Docket No. 2008-325-C

FIRST SET OF INTERROGATORIES TO TIME WARNER CABLE INFORMATION SERVICES (SOUTH CAROLINA), LLC

IT IS HEREIN REQUESTED:

- 1

- F. That, if the requested information exceeds twenty-five (25) pages in length, the requested information be bound in ring binders (loose leaf notebook) or otherwise bound.
- G. That, in addition to the signature and verification at the close of Time Warner's response, the person responsible for the information contained in each answer be indicated.
- H. That each of these Interrogatories be reproduced at the beginning of each of the responses.
- I. That the responses be sent to:
- M. John Bowen, Jr.
Margaret M. Fox
McNair Law Firm, P.A.
1301 Gervais Street
Columbia, SC 29201
Post Office Box 11390 (ZIP 29211)
- J. If the response to any Interrogatory is that the information requested is not currently available, state when the information requested will be available.
- K. These Interrogatories shall be deemed continuing so as to require Time Warner to supplement or amend its responses as any additional information becomes available.

INTERROGATORIES

- 1-1 Please provide a corporate organizational chart that shows Time Warner, Inc. ("Time Warner") and its affiliates, as defined in S.C. Code Ann. § 35-2-201.
- 1-2 Please describe the corporate relationships (i.e., owner, affiliate, subsidiary, partner, etc.), including all intermediate relationships, between Time Warner and the following entities. For each entity also identify its legal name and all d/b/a's, assumed names, trade marks, service marks, and brands, and describe the existing and planned or contemplated roles of the entity in the providing of telephone, telecommunications, voice, data, or cable television services in South Carolina. If the entity is not affiliated with Time Warner in any way, please state "none."
- (a) Time Warner Cable
 - (b) Time Warner Cable Capital, L.P.
 - (c) Time Warner Cable I LLC
 - (d) Time Warner Cable Inc.
 - (e) Time Warner Cable Information Services (International), LLC
 - (f) Time Warner Cable Information Services

- (g) Time Warner Cable Information Services, LLC
- (h) Time Warner Cable Information Services (South Carolina), LLC
- (i) Time Warner Cable – SC Political Action Committee
- (j) Time Warner Entertainment Company L.P.
- (k) Time Warner Inc.
- (l) Time Warner, Inc.
- (m) Time Warner NY Cable LLC
- (n) Time Warner Operations Inc.
- (o) Time Warner Telecom of South Carolina, LLC
- (p) tw telecom of south carolina, llc
- (q) T W C Construction, Inc.
- (r) T.W.C., Inc.
- (s) TW Capital Partners, LP
- (t) TW Capital, LLC
- (u) TW Communications, Inc.
- (v) T-W Construction Company LLC
- (w) TWC Communications, LLC
- (x) TWC Holdings, Inc.
- (y) TWC Management, Inc.
- (z) TWC Services, Inc.
- (aa) TWC, Inc., the Construction Division
- (bb) TWC, LLC
- (cc) T W Investments, LLC
- (dd) T W Telecom, L.P.
- (ee) T.W. Enterprises, Inc. of the Carolinas
- (ff) T.W. Technologies, Inc.
- (gg) T.W. Utility Services, Inc.
- (hh) TW Associates, Inc.
- (ii) TW Group, LLC
- (jj) TW Holdings, Inc.
- (kk) TW Investors, Inc.
- (ll) TW Landscaping, Inc.
- (mm) TW of Bluefield, Inc.
- (nn) TW Partners Agency of Alabama, Inc.
- (oo) TW Real Estate, LLC
- (pp) TW Recreational Services, Inc.
- (qq) TW Services, Inc.
- (rr) TW Services, LLC
- (ss) TW Telecom Holdings, Inc.
- (tt) TW Telecom of South Carolina, LLC
- (uu) TW, LLC
- (vv) TW-JD Office Building, LLC

- 1-3 Identify all entities which have entered or plan or contemplate to enter into a partnership, LLC, joint venture or contractual relationship for the purpose of engaging in a line of business (hereinafter "business partner" for purposes of these interrogatories) with an affiliate of Time Warner.
- 1-4 Identify all Time Warner affiliates and business partners previously existing, currently existing or anticipated to exist in the future, including those listed in Interrogatory 1-2 and those identified in response to Interrogatory 1-3, that were, are or may be involved directly or indirectly in the provision of voice or data services to customers in the State of South Carolina. The entities identified in response to this Interrogatory shall be referred to collectively as the "Time Warner Companies," and individually as a "Time Warner Company" for purposes of these interrogatories.
- 1-5 For the Time Warner Companies providing, or involved with providing, voice or data services to customers in South Carolina, please respond to the following:
- i. Identify the services offered by each Time Warner Company.
 - ii. Are these services used in the provision or support of local exchange service?
 - iii. Are these services used in the provision or support of wholesale services?
 - iv. Are these services used in the provision or support of any other voice or data service?
- 1-6 Is any Time Warner Company currently providing retail local exchange service within the service territory of Farmers? If so, please respond to the following:
- i. Please identify the Time Warner Company or Companies currently providing the retail local exchange service.
 - ii. Please describe the retail local exchange service(s) that is being provided within the service territory.
 - iii. Is the retail local exchange service(s) provided via resale or facilities based?
 - iv. Is the retail local exchange service(s) tariffed?
 - v. Is the retail local exchange service(s) provided in all of Farmers' exchanges? If no, please list the exchanges where the retail local exchange(s) service is being provided.
- 1-7 Is any Time Warner Company seeking, planning or contemplating to provide retail local exchange service within the service territory of Farmers? If so, please respond to the following:
- i. Please identify the Time Warner Company or Companies seeking, planning or contemplating to provide the retail local exchange service.
 - ii. Please describe the retail local exchange service(s) that will be provided within the service territory.
 - iii. Will the retail local exchange service(s) be provided via resale or facilities based?
 - iv. Will the retail local exchange service(s) be tariffed?
 - v. Will the retail local exchange service(s) be provided in all of Farmers' exchanges?

If no, please list the exchanges where the retail local exchange(s) service will be provided.

1-8 Is any Time Warner Company seeking, planning or contemplating to provide a telecommunications service in Farmers' service area that is not a local exchange service? If so, please respond to the following:

- i. Please identify the Time Warner Company or Companies seeking, planning or contemplating to provide the telecommunications service(s).
- ii. Identify and describe all telecommunications services that are not local exchange services that the Time Warner Company or Companies is seeking, planning or contemplating to offer?

1-9 Is any Time Warner Company seeking, planning or contemplating to provide any wholesale interconnection services or wholesale telecommunications services (collectively, referred to as "Wholesale Services") in Farmers' service area? If yes, please identify which Time Warner Company or Companies is seeking to provide the Wholesale Services, describe the Wholesale Services to be provided, and, for each Wholesale Service to be provided, please respond to the following:

- i. Is or will the Wholesale Service be tariffed?
- ii. Identify the Farmers exchanges in which the Time Warner Company or Companies seeks, plans or contemplates to provide the Wholesale Service.
- iii. Identify all potential Wholesale Service customers each Time Warner Company or Companies is seeking, planning or contemplating to provide Wholesale Services projects for itself in South Carolina over the next five years.
- iv. Identify all Wholesale Service customers each Time Warner Company or Companies currently has in the State of South Carolina.
- v. Identify all Wholesale Service customers each Time Warner Company or Companies currently has in Farmers' service area.
- vi. Identify which of the Wholesale Service customers identified in the previous questions for each Time Warner Company is an interconnected VoIP provider as this term is defined by the FCC in 47 C.F.R § 52.21 and § 54.5.
- vii. Identify all Time Warner Companies which provide access to telephone numbers for its Wholesale Service customers in the State of South Carolina and nationwide. For purposes of this question, "Time Warner Company" includes any affiliate of Time Warner or a business partner of an affiliate of Time Warner that was, is or may be involved directly or indirectly in the provision of voice or data services to customers outside the State of South Carolina.
- viii. Identify all Time Warner Companies which provide numbers to its Wholesale Service customer(s) for that customer's VoIP service in the State of South Carolina and nationwide. For purposes of this question, "Time Warner Company" includes any affiliate of Time Warner or a business partner of an affiliate of Time Warner that was, is or may be involved directly or indirectly in the provision of voice or data services to customers outside the State of South Carolina.

- ix. Identify how many numbers each Time Warner Company has provided to its Wholesale Service customers that are in use by end user customers in the State of South Carolina and nationwide. For purposes of this question, "Time Warner Company" includes any affiliate of Time Warner or a business partner of an affiliate of Time Warner that was, is or may be involved directly or indirectly in the provision of voice or data services to customers outside the State of South Carolina.
- x. Please identify all telecommunications services (as defined by 47 U.S.C. § 153 (46)) that each Time Warner Company provides to its Wholesale Service customers, by company.

1-10 Please respond to the following questions on behalf of each Time Warner Company. The following questions address which services each Time Warner Company considers to be telecommunications services (as defined by 47 U.S.C. § 153 (46)), as well as the delivery of such services by each Time Warner Company, where applicable:

- i. Does the Time Warner Company consider the provision of 10 digit telephone numbers a telecommunications service?
- ii. If the Time Warner Company has provided numbers to a Wholesale Service customer, are the numbers associated with local exchange telecommunications service?
- iii. Does the Time Warner Company consider the porting of numbers a telecommunications service?
- iv. Does the Time Warner Company consider the provision of 911 and telephone relay service (TRS) to its Wholesale Service customers a telecommunications service?
- v. Does the Time Warner Company consider operator services and directory assistance telecommunications services?
- vi. In which service territories in South Carolina are 911, TRS, toll, and directory listings available from the Time Warner Company? Please describe how the Time Warner Company delivers these services.
- vii. Does the Time Warner Company consider the calls originated by its Wholesale Service customers that provide interconnected VoIP services to be telecommunications service?

1-11 Please describe the network configuration of each Time Warner Company that provides Wholesale Service to Wholesale Service customers. The description should describe the network configuration of the company while providing the Wholesale Services to its Wholesale Service customers.

1-12 What is each Time Warner Company's projected number of end users in Farmers' service area that will interconnect through a Time Warner Company's service in the next 5 years?

- i. How many of these projected customers are business customers?
- ii. How many of these projected customers residential customers?

- 1-13 Does any Time Warner Company contribute to the South Carolina Universal Service Fund? If so, please identify the Time Warner Companies, provide the amount of contributions by company for the years 2005, 2006, and 2007, and specify whether any portion of the contribution is based on interconnected VoIP retail revenue.
- 1-14 Does any Time Warner Company contribute to the federal Universal Service Fund? If so, please identify each of the Time Warner Companies, and provide the amount of contributions by company for the years 2005, 2006, and 2007. For each Time Warner Company, please indicate whether the company bases its estimate of VoIP-based service revenues on the FCC proxy percentage of traffic in the interstate jurisdiction, or provides a traffic study to justify the interstate traffic amounts.
- 1-15 In any areas nationwide, where any Time Warner Company provides Wholesale Service, has any Time Warner Company received a bill for intrastate and/or interstate switched access charges for traffic terminated to an ILEC? If so, please identify the Time Warner Company or Companies. For purposes of this question, "Time Warner Company" includes any affiliate of Time Warner or a business partner of an affiliate of Time Warner that was, is or may be involved directly or indirectly in the provision of voice or data services to customers outside the State of South Carolina.
- 1-16 For the Time Warner Company or Companies identified in Interrogatory 1-15, has the Time Warner Company or Companies paid the access bill? If not, has the Time Warner Company or Companies ever disputed payment of an ILEC access bill on the grounds that the service in question utilizes VoIP or for any other reason? If yes, please provide a description of the dispute and resolution for each Time Warner Company. For purposes of this question, "Time Warner Company" includes any affiliate of Time Warner or a business partner of an affiliate of Time Warner that was, is or may be involved directly or indirectly in the provision of voice or data services to customers outside the State of South Carolina.
- 1-17 Please respond to the following behalf of each Time Warner Company:
- i. What if any retail services are any of the Time Warner Companies providing to end user customers in the state of South Carolina? Please specify which Time Warner Company is offering which retail service(s).
 - ii. What if any retail services are any of the Time Warner Companies providing to end user customers nationwide? For purposes of this question, "Time Warner Company" includes any affiliate of Time Warner or a business partner of an affiliate of Time Warner that was, is or may be involved directly or indirectly in the provision of voice or data services to customers outside the State of South Carolina.
 - iii. Have any of the Time Warner Companies, at any time, obtained a certificate of public convenience and necessity or other authorization to provide local exchange telecommunications service? If yes, please list each state where certification has been granted. For purposes of this question, "Time Warner Company" includes any affiliate of Time Warner or a business partner of an affiliate of Time Warner


- that was, is or may be involved directly or indirectly in the provision of voice or data services to customers outside the State of South Carolina.
- iv. Are any of the Time Warner Companies currently providing a retail service called "Digital Phone" service? In the past five years, have any of the Time Warner Companies provided a retail service called "Digital Phone" service? For purposes of this question, "Time Warner Company" includes any affiliate of Time Warner or a business partner of an affiliate of Time Warner that was, is or may be involved directly or indirectly in the provision of voice or data services to customers outside the State of South Carolina.
 - v. If any of the Time Warner Companies have offered or are offering a retail service called "Digital Phone," has this service ever been offered pursuant to a certificate of public convenience and necessity or other authorization in any state? If so, please list the states. If not, under what type of authority was this service offered to end users? For purposes of this question, "Time Warner Company" includes any affiliate of Time Warner or a business partner of an affiliate of Time Warner that was, is or may be involved directly or indirectly in the provision of voice or data services to customers outside the State of South Carolina.
 - vi. If the "Digital Phone Service" was offered pursuant to a certificate of public convenience and necessity or other authorization by any of the Time Warner Companies, have any of these companies ever filed a letter with a state commission indicating that it would no longer provide the "Digital Phone" service pursuant to its state certification of public necessity and convenience or other authorization? If so, in which states has this occurred? Please provide copies of the filed letters and correspondence. For purposes of this question, "Time Warner Company" includes any affiliate of Time Warner or a business partner of an affiliate of Time Warner that was, is or may be involved directly or indirectly in the provision of voice or data services to customers outside the State of South Carolina.
 - vii. If any of the Time Warner Companies have ever filed a letter with a state commission indicating that it would no longer provide the "Digital Phone" service pursuant to its state certification or authorization, what was the reason for withdrawing the provision of "Digital Phone" service from state certification or authorization? For purposes of this question, "Time Warner Company" includes any affiliate of Time Warner or a business partner of an affiliate of Time Warner that was, is or may be involved directly or indirectly in the provision of voice or data services to customers outside the State of South Carolina.
 - viii. Do any of the Time Warner Companies believe that "Digital Phone" service is a telecommunications service? If yes, please explain the basis for this belief.

1-18 Please state how each Time Warner Company provides or plans to provide service to its residential and business telephone customers. Specifically who provides the dial tone, features, and long distance services? If this is provided by a third Party, please identify the third party and describe how/where the Time Warner Company interconnects with the third party provider.

- 1-19 Does any Time Warner Company use assets owned by any subsidiary or division of Time Warner Inc. in order to provide customers digital telephone service? If so, please identify the subsidiary (hereinafter for purposes of this set of Interrogatories defined as "Time Warner Cable") and describe what assets are used. If not, please describe how end users are served – i.e. who owns the cable that goes into the house or business.
- 1-20 Please describe the network elements (i.e. the physical cable loop that serves the customer), where the Time Warner Company connects or interconnects with Time Warner Cable in order to use this network facility.
- 1-21 Does Time Warner Cable charge the Time Warner Company for using this cable as described above? If yes, how much does Time Warner Cable charge the Time Warner Company to use this cable?
- 1-22 Is Time Warner Cable willing to provide the same network assets to other carriers other than the Time Warner Company? If not, why not?
- 1-23 Does Time Warner Cable consider itself to be a telecommunications carrier as defined in 47 U.S.C. §153? Please explain the basis for your response.
- 1-24 Does Time Warner Cable Information Services (South Carolina), LLC consider itself to be a telephone utility, as defined in S.C. Code Ann. § 58-9-10(6)? If yes, list the specific services Time Warner Cable Information Services (South Carolina), LLC believes the Commission will have the authority to regulate.
- 1-25 Do the Time Warner Companies believe they should be regulated differently than traditional phone companies or CLECs? If yes, please explain why.
- 1-26 Which of the following services should not be considered to meet the definition of "telecommunications service" in S.C. Code Ann. § 58-9-10(15) and in 47 U.S.C. § 153(46)? Please identify and provide a corresponding response for each Time Warner Company.
- i. Providing dial tone to end users via a TDM switch over traditional copper pair of wires
 - ii. Reselling ILEC telephone wires and using its own TDM or VOIP switch to provide dial tone to end users
 - iii. Providing dial tone to end users via a TDM or VOIP switch over traditional copper pair of wires or fiber
 - iv. Providing dial tone to end users over Time Warner Cable owned wires, using an owned or through third-party TDM or VOIP switch.
- 1-27 Do the Time Warner Companies believe that all "telecommunications service," as defined in S.C. Code Ann. § 58-9-10(15) and in 47 U.S.C. § 153(46), should be regulated equally, regardless of its technology - (i.e. cable, fiber, copper wire, TDM, or VOIP)? If not, why not?

- 1-28 List the areas in Farmer's service territory in which Time Warner Cable or an affiliated company provides video and/or cable television services. For each area, list the date Time Warner Cable or an affiliated company began providing video and/or cable television services.
- 1-29 State Time Warner Cable Information Services (South Carolina), LLC's net income for each of the past five years.

Respectfully submitted,

By: 
M. John Bowen, Jr.
Margaret M. Fox
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
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ATTORNEYS FOR FARMERS
TELEPHONE COOPERATIVE, INC.

Columbia, South Carolina

October 17, 2008

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA

Docket No. 2008-325-C

IN RE: Application of Time Warner Cable Information)
 Services (South Carolina), LLC, d/b/a Time)
 Warner Cable to Amend its Certificate of Public)
 Convenience and Necessity to Provide)
 Telephone Services in the Service Area of)
 Farmers Telephone Cooperative, Inc. and for)
 Alternative Regulation)

FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO TIME WARNER CABLE
INFORMATION SERVICES (SOUTH CAROLINA), LLC

Pursuant to 26 S.C. Code Ann. Regs. 103.833 and other applicable rules of the
Public Service Commission of South Carolina, Farmers Telephone Cooperative, Inc.,
("Farmers") requests that Time Warner Cable Information Services (South Carolina), LLC, d/b/a
Time Warner ("Time Warner") produce the documents described below within twenty (20) days
of service hereof.

IT IS HEREIN REQUESTED:

- A. That all information shall be provided to the undersigned in the format requested.
- B. That all responses to the below requests shall be labeled using the same number as used herein.
- C. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the Interrogatory in the appropriate sequence.
- D. That any inquiries or communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.

- E. That all exhibits be reduced to 8-1/2" x 11" format.
- F. That, if the requested information exceeds twenty-five (25) pages in length, the requested information be bound in ring binders (loose leaf notebook) or otherwise bound.
- G. That, in addition to the signature and verification at the close of Time Warner's response, the person responsible for the information contained in each answer be indicated.
- H. That each of these Interrogatories be reproduced at the beginning of each of the responses.
- I. That the responses be sent to:

M. John Bowen, Jr.
Margaret M. Fox
McNair Law Firm, P.A.
1301 Gervais Street
Columbia, SC 29201
Post Office Box 11390 (ZIP 29211)

- J. If the response to any Interrogatory is that the information requested is not currently available, state when the information requested will be available.
- K. These Interrogatories shall be deemed continuing so as to require Time Warner to supplement or amend its responses as any additional information becomes available.

REQUESTS FOR THE PRODUCTION OF DOCUMENTS

Request No. 1-1: Please provide copies of all documents, writings, exhibits listed in, referred to, or used in the preparation of Time Warner Cable Information Services (South Carolina), LLC's Responses to Farmers' First Set of Interrogatories.

Request No. 1-2: Please provide copies of all contracts with any third party that Time Warner Company customers use to make or complete calls on the Time Warner Company network in South Carolina.

Request No. 1-3: For each Time Warner Company that has Wholesale Service customers, please provide copies of all Wholesale Service agreements that each Time Warner Company has with Wholesale Service customers in South Carolina.

Request No. 1-4: Please provide copies of all forms filed with the administrator of the South Carolina USF on behalf of all Time Warner Companies that were used to determine that Time Warner Company's contribution to date.

Request No. 1-5: Please provide copies of all Form 499Q & 499A filed by a Time Warner Company with USAC.

Request No. 1-6: If any of the Time Warner Companies has ever filed a letter with a state commission indicating that it would no longer provide the "Digital Phone" service pursuant to its state certification or authorization, please provide the letters of notice provided to end user customers that notified them of the discontinuation of the Digital Phone service as a regulated service.

Request No. 1-7: Please provide copies of Time Warner Cable Information Services (South Carolina), LLC's financial statements for the last five years.

Request No. 1-8: Please provide copies of Time Warner Cable Information Services (South Carolina), LLC's Annual Reports filed with the Public Service Commission or Office of Regulatory Staff for the last five years.

Request No. 1-9: Please provide copies of any financial projections prepared by or for Time Warner Cable Information Services (South Carolina), LLC in the last three years including associated detail and data.

Request No. 1-10: Please provide a copy of a South Carolina customer bill (with customer identifying information redacted) showing billed amounts for State USF and federal USF.

Request No. 1-11: Please provide a map(s) depicting Time Warner Cable's facilities in South Carolina.

Request No. 1-12: Please provide a map(s) depicting Time Warner Cable's proposed build out of cable facilities in South Carolina over the next 3 years.

Respectfully submitted,

By: Margaret M. Fox

M. John Bowen, Jr.

Margaret M. Fox

McNair Law Firm, P.A.

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ATTORNEYS FOR FARMERS
TELEPHONE COOPERATIVE, INC.

Columbia, South Carolina

October 17 2008

Docket No. 2008-325-C

CERTIFICATE OF SERVICE

Frank Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
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1901 Main Street, Suite 1200
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C. Bradley Hutto, Esquire
Williams & Williams
Post Office Box 1084
Orangeburg, South Carolina 29115

COLUMBIA 934188v1